

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SCHRADER CELLARS, LLC,

Plaintiff,

v.

ROBERT M. ROACH,

Defendant.

Case No. [21-cv-01431-SK](#)

SPECIAL VERDICT FORM

1. Do you find Randy M. Roach (“Roach”)’s breach of his fiduciary duties as an attorney was a substantial factor in causing Schrader Cellars, LLC (“Cellars”) harm?

Yes_____ No_____

If Yes, proceed to Question 2. If No, sign and return the verdict. No further questions need to be answered.

2. Do you find that on or before September 2, 2019, Cellars knew, or with reasonable diligence should have discovered, the facts of Roach’s alleged wrongful act or omission?

Yes_____ No_____

If Yes, proceed to Question 3. If No, proceed to Question 4.

3. Do you find Cellars sustained actual injury from Roach’s breach of his fiduciary duties before September 2, 2019?

Yes_____ No_____

If No, proceed to Question 4. If Yes, sign and return the verdict. No further questions need to be answered.

4. Do you find that the gravamen – or heart – of the claim that Cellars brings for breach of fiduciary duty against Roach is based on his filing of the Texas lawsuit?

1 Yes _____ No _____

2 *If No, proceed to Question 5. If Yes, sign and return the verdict. No further questions need to be*
3 *answered.*

4 5. What damages do you find that Cellars incurred as a result of Roach's breach?

5 Amount: _____

6 *Proceed to Question 6.*

7 6. Should Schrader Cellars receive prejudgment interest on its loss?

8 Yes _____ No _____

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10 *Sign and return the verdict.*

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(Signature of jury foreperson)

Date

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